IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

Benjamin George,

Plaintiff, Case No.: 20 CV 6911

v. Hon. Judge: Robert Blakey

City of Chicago, et al, Mag. Judge: Beth W. Jantz

Defendants.

JOINT STATUS REPORT

The parties, by and through their undersigned counsel, submit the following Joint Status Report on status of settlement correspondence in accordance with the Court's Order on July 26, 2023 (Dkt. 136) and state as follows:

- 1. Defendant City of Chicago, the Officer Defendants, and Plaintiff submitted settlement correspondence within the Court's deadlines. Defendants Gardiner and Sikanich have not yet submitted settlement correspondence. Defendants' Gardiner and Sikanich's counsel had been out of the office for several weeks in June/July dealing with the illness and death of his father, and was delayed in responding to the settlement demand. He has not been able to obtain a response from Sikanich as of this date. However, Gardiner and Sikanich have no objection to the proposed extension for the reasons set forth below, and anticipate providing a response to the demand during this week.
- 2. The parties are discussing the prospect of settlement. However, the delay in settlement correspondence from Defendants Gardiner and Sikanich has rendered it impossible to have a full discussion among the parties and between attorneys and clients regarding this avenue.

In light of this, and consistent with the Court's encouragement to explore settlement prior to undertaking the expense and time of expert discovery should it prove ultimately unnecessary, the parties respectfully request that existing expert discovery deadlines be extended by 60 days. Such an extension would facilitate a full exploration of possible settlement.

Respectfully submitted,

/s/Daniel Massoglia

One of Plaintiff's Attorneys

Emma Melton

Daniel E. Massoglia

Joseph P. DiCola

Daniel A. Lastres

First Defense Legal Aid

601 S. California Ave.

Chicago, IL 60612

708.797.3066

emma@first-defense.org

daniel@first-defense.org

joseph@first-defense.org

lastres@first-defense.org

Attorneys for Plaintiff Benjamin George

/s/ Gregory Beck

Assistant Corporation Counsel Supervisor City of Chicago, Department of Law 2 North LaSalle Street, Suite 420 Chicago, Illinois 60602 (312) 742-5146 (p)

Attorney for Defendants Peter Palka, Daniel Smith, Bilos, and Joseph Ferrara

/s/ Jordan Yurchich

Chief Assistant Corporation Counsel City of Chicago Department of Law Federal Civil Rights Litigation Division 2 North LaSalle Suite 420 Chicago, IL 60602 (312)-742-6408

Attorney for Defendants Solomon Ing and Sergio Corona

/s/ Caroline Fronczak

Deputy Corporation Counsel Federal Civil Rights Litigation Division City of Chicago, Department of Law 2 N. LaSalle Street, Suite 420 Chicago, Illinois 60602 312-744-5126 Attorney for Defendant The City of Chicago

/s/ Thomas D. Carroll

Thomas R. Raines
Attorney at Law, LLC
20 N. Wacker Drive
Suite 556
Chicago, IL 60606
Tel (312) 750-1166
Attorney for Defendants James Gardiner and Charles Sikanich

CERTIFICATE OF SERVICE

I hereby certify that a copy of this document was filed on July 31, 2023 using the Court's CM/ECF filing system, which generates electronic notice to all parties of record in the case.

Respectfully submitted,
/s/Daniel Massoglia
One of Plaintiff's Attorneys